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Report to the Federal Communications Commission on Carrier Efforts Toward Attaining Digital TTY Accessibility, and the Status of the Various Technological Solutions, as Provided by CC Docket No. 94-102, In the Matter of Revision of the Commission's Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems

El Dorado Cellular, A California Corporation d/b/a Mountain Cellular ("Mountain Cellular"), by its attorneys, pursuant to the Federal Communications Commission's ("Commission") *Fourth Report and Order* in CC Docket No. 94-102,¹ hereby files a Quarterly Report for the quarter ending June 30, 2002, reporting that Mountain Cellular's digital wireless network is capable of transmitting 911 calls using text telephone ("TTY") devices, and as such, Mountain Cellular is compliant with Commission Rule 20.18(c).

In the *Fourth Report and Order* the Commission established December 31, 2001 as the new deadline for carriers operating digital wireless systems to have obtained all software upgrades and equipment necessary to make their systems capable of transmitting 911 calls from TTY devices. It further established June 30, 2002 as the deadline for carriers to integrate, test and deploy the technology in their systems in conjunction with the public safety community. In order to be assured that the aforementioned deadlines will be met without complication, the Commission required digital wireless carriers to submit Quarterly Reports fifteen days after the end of each quarter.² Until the second quarter of 2002, Mountain Cellular exclusively provided AMPS service in its service area, and therefore, compliance with the December 31, 2001 deadline was not applicable to it. Nonetheless, in anticipation of its deployment of CDMA technology, Mountain Cellular filed Quarterly Reports with the Commission.³ Mountain Cellular now files this instant report with the Commission.

I. Carrier Background

Mountain Cellular provides analog and on June 1, 2002, deployed digital CMRS wireless service in California RSA 11 – El Dorado.⁴ Even though Mountain Cellular would not be subject to the TTY digital deployment aspect of 20.18(c) until it offered digital wireless service, Mountain Cellular had expected to deploy CDMA over its network during the first quarter of

¹In the Matter of Revision of the Commission's Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems, *Fourth Report and Order*, CC Docket No. 94-102, 15 FCC Rcd 25216, 65 Fed. Reg. 82293 (December 28, 2000), ("*Fourth Report and Order*").

²*Id.*

³Before its digital deployment during the second quarter of 2002, Mountain Cellular filed a total of five quarterly reports with the Commission on this issue. (April 15, 2001, July 15, 2001, October 15, 2001, January 15, 2002, and April 15, 2002.)

⁴Station KNKN220 (CMA346B).

2002. However, Mountain Cellular, was concerned about the possibility of a delay between the date of CDMA deployment and the date that it would obtain all software upgrades and equipment necessary to make its then future digital network capable of transmitting 911 calls from TTY devices. Therefore, Mountain Cellular filed a request for waiver of the Commission's December 31, 2001 deadline.⁵ The Commission has not yet acted on Mountain Cellular's request for waiver. In filing this instant report Mountain Cellular notes the following: (1) due to technical difficulties, Mountain Cellular was still exclusively providing AMPS service in its service area during the first quarter of 2002; and, (2) Mountain Cellular made its new CDMA network operational during the second quarter of 2002, and on that date of deployment, Mountain Cellular was compliant with Commission Rule 20.18(c).

II. Access to E911 Through TTY Devices

Mountain Cellular uses AMPS and CDMA equipment provided by Motorola, Inc. ("Motorola") for its wireless network infrastructure. Before the second quarter of 2002, Motorola provided Mountain Cellular with written confirmation that the Motorola equipment Mountain Cellular purchased to support its digital network was TTY compliant. Mountain Cellular is prohibited under non-disclosure agreement with Motorola from releasing the specifics of this information but Mountain Cellular can make that information available to the Commission for *in camera* inspection, should the Commission so request. Mountain Cellular recently requested that Motorola confirm the TTY functionality of its equipment. Motorola's response is appended hereto as **Exhibit A**. Mountain Cellular is not capable of independently verifying the information presented therein, but has no reason to believe it is not accurate, particularly since Mountain Cellular's infrastructure provider, Motorola, installed and enabled the Motorola TTY feature for CDMA cellular infrastructure on the Mountain Cellular switch of the same type and standard that Motorola had tested and approved on other carriers' switches prior to June 30, 2002.⁶

The primary handset providers to Mountain Cellular are Motorola and Nokia. Mountain Cellular has not had access to any TTY-compliant handsets. However, Motorola, Mountain Cellular's infrastructure equipment provider, tested and approved its TTY feature for CDMA cellular infrastructure with six different handset manufacturers' TTY-compatible CDMA handsets prior to June 30, 2002.⁷ Further, Mountain Cellular has requested that its handset manufacturers provide information on their progress in releasing commercially available TTY-compatible CDMA handsets. Motorola's response is appended hereto as **Exhibit A**. Mountain Cellular is not capable of independently verifying the information presented therein, but has no reason to believe it is not accurate. Mountain Cellular has not yet received a response to its

⁵El Dorado Cellular, A California Corporation d/b/a Mountain Cellular Petition for Waiver of the Deadline established in the Fourth Report and Order, CC Docket No. 94-102, FCC 00-436 (December 27, 2001).

⁶ See *infra*, Motorola TTY Compatibility Development Status Report, app.

⁷ See Motorola's 5th Quarter 2002 TTY Compatibility Development Status Report, filed with the FCC through the TTY Forum on April 15, 2002.

query from Nokia, and therefore cannot report on its development activities. In the past, however, Nokia provided this information directly to the Commission in its own quarterly report, and Mountain Cellular presumes that Nokia will follow the same procedure for this quarter.

The appended Motorola information is respectfully submitted in response to these issues, as required in the Commission's *Fourth Report and Order* (rel. Dec 14, 2000).

A. Development Activities

- (1) *Network Infrastructure Software Development*
- (2) *Handset Development and Testing Plans*
- (3) *Beta Testing and Lab Testing*
- (4) *Release and General Availability to Carriers of Network Infrastructure Software*
- (5) *Availability to Carriers of Full Acceptance Test Units*
- (6) *Efforts Toward Achieving Digital Wireless Solution Compatibility With Enhanced TTY Devices*

Mountain Cellular has been advised that its digital network, as presently operating, meets the FCC's requirements for TTY compatibility.

B. Testing and Deployment Activities

Mountain Cellular has not had access to TTY-compliant CDMA handsets. With regard to item number 7, however, Mountain Cellular has communicated with the California State Highway Patrol, the designated Public Safety Answering Point ("PSAP") for all wireless carriers in California, to advise them that Mountain Cellular's digital network supports TTY calls made using a TTY-compatible CDMA handset. Mountain Cellular is not responsible for, nor has any control over, the Public Safety Community obtaining digital TTY-compatible equipment. Nonetheless, Mountain Cellular has made the PSAP aware that the TTY Forum (through ATIS) offers a diagnostic test to determine if the PSAP's equipment is digital TTY-compatible.⁸ With regard to item number 8, Motorola has successfully conducted all necessary testing of Mountain Cellular's switch, to the extent that the switch and requisite software is of the same type and standard as the TTY functionality that Motorola tested and approved prior to June 30, 2002. Motorola's response is appended hereto as **Exhibit A**. With respect to item 9, Mountain Cellular has requested information from Motorola; Motorola's response is appended hereto. With respect to item 10, TTY compatibility is available throughout all portions of the Mountain Cellular network where digital CDMA has been deployed.

- (7) *Carrier Coordination of Testing With PSAP*
- (8) *Carrier Testing Activities, Including Field Testing, Consumer End-to-end Testing, and Other Necessary Tests*

⁸ The diagnostic test can be found on the Alliance for Telecommunications Industry Solutions ("ATIS") webpage, www.atis.org, at TWIP (TTY Wireless Inter-Operability with PSAP TTY) Test, last checked on July 8, 2002.

- (9) *Retail Availability of Necessary Consumer Equipment*
- (10) *Geographic Scope of Network Infrastructure Deployment*

III. Conclusion

Motorola installed and enabled its TTY feature for CDMA cellular infrastructure on Mountain Cellular's TTY capable switch before Mountain Cellular began to deploy digital CDMA service in its market. Based on the Motorola installation, Mountain Cellular is in compliance with Commission Rule 20.18(c), to make its digital network capable of transmitting 911 calls from TTY devices and has been so in advance of the Commission's June 30, 2002 deadline. Accordingly, no further quarterly reports will be filed by Mountain Cellular.

Respectfully Submitted,

El Dorado Cellular, A California Corporation d/b/a
Mountain Cellular

Dated: July 15, 2002

/S/ Anna E. Ward

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Its Attorneys

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EXHIBIT A

MOTOROLA TTY COMPATIBILITY DEVELOPMENT STATUS REPORT 2nd Quarter 2002

Product	Standard	Status	Milestones	Progress
CDMA Handset	IS 127-3 IS 733-2	Carrier deployment	IOT: June 2001 UI: October 2001 ROM: December 2001 SA: May 2002	Handset development work complete. V60i and V120c CDMA phones have been approved for shipment.
GSM Handset	TS 26.226 TS 26.230 TR 26.231	Carrier deployment	UI: October 2001 IOT: October 2001 ROM: January 2002 SA: July 2002	Handset development work complete. V60i GSM phone has been approved for shipment. P280i expected to be approved for shipment in July
iDEN Handset		Carrier deployment	Production handsets available to carriers.	Handset work complete.
TDMA Handset	IS 823-A IS 840-A	Carrier deployment	IOT: September 2001 UI: September 2001 ROM: October 2001 SA: April 2002	Handset development work complete. V60i and V120t TDMA phone has been approved for shipment.
CDMA Infrastructure	IS 127-3 IS 733-2	Carrier deployment	FOA Jan 02 Software release available	Carrier testing complete.
iDEN Infrastructure		Carrier deployment	Production software available to carriers	Infrastructure software available for carrier deployment.

Note: Motorola works with its carrier customers to provide them specific information related to their respective products.

Note: IOT is Inter Op Testing with RAM based parts for Character Error Rate testing
UI is User Interface testing with HCO / VCO support
ROM is the availability of ROM based phones. These should be functionally identical to a RAM phone.
SA is Ship Acceptance of production volume quantities

Rex Ellington
Product Safety & Compliance
Motorola – Personal Communications Sector
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CERTIFICATE OF SERVICE

I, LaWanda Y. Tyson, a secretary with the law firm of Kurtis & Associates, P.C., do hereby certify that I have this 15th day of July 2002, filed the foregoing “REPORT TO THE FEDERAL COMMUNICATIONS COMMISSION ON CARRIER EFFORTS TOWARD ATTAINING DIGITAL TTY ACCESSIBILITY, AND THE STATUS OF THE VARIOUS TECHNOLOGICAL SOLUTIONS, AS PROVIDED BY CC DOCKET NO. 94-102, IN THE MATTER OF REVISION OF THE COMMISSION’S RULES TO ENSURE COMPATIBILITY WITH ENHANCED 911 EMERGENCY CALLING SYSTEMS” electronically with the Federal Communications Commission’s Electronic Comment Filing System. I have also filed a copy of this report with the Federal Communications Commission’s copy contractor, Qualex International. In addition, a copy of this report has been provided to Melinda Littell of the Commission’s Wireless Telecommunications Bureau.

/S/ LaWanda Y. Tyson
LaWanda Y. Tyson